

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED

MAR 20 4 50 PM '00

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS KINGSLEY TO INTERROGATORY OF
THE ASSOCIATION FOR POSTAL COMMERCE
(POSTCOM/USPS-T10-7)

The United States Postal Service hereby provides the response of witness
Kingsley to the following interrogatory of the Association for Postal Commerce:
POSTCOM/USPS-T10-7, filed on March 6, 2000.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990 Fax -5402
March 20, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORIES OF ASSOCIATION FOR POSTAL COMMERCE**

POSTCOM/USPS-T10-7 Please refer to your response to PostCom/USPS-T-10-1. Display each of the calculations to which your answer to that interrogatory refers with exact citation to each of the factors in each of those calculations.

RESPONSE:

- (a) cost/hour by LDC**
- (b) cost/TPH (000)**
- (c) total pieces handled (000) (TPH (000))**
- (d) MODS workhours**
- (e) cost of hours**

Manual Flats - \$69.00/1000

$$\begin{array}{rcccl} & (a) & & (d) & & (b) \\ 27.06 & \times & 967.472 & = & 69.00 \\ 379,412 & & & & \\ (c) & & & & \end{array}$$

note: (a) x (d) = (e) = 26,179,792

Manual Letters - \$58.80/1000

$$\begin{array}{rcccl} & (a) & & (d) & & (b) \\ 27.06 & \times & 3,545.522 & = & 58.80 \\ 1,631,566 & & & & \\ (c) & & & & \end{array}$$

note: (a) x (d) = (e) = 95,941,825

Automation Letters - \$5.41/1000

$$\begin{array}{rcccl} & (a) & & (d) & & (b) \\ 26.57 & \times & 4,402.938 & = & 5.41 \\ 21,624,045 & & & & \\ (c) & & & & \end{array}$$

note: (a) x (d) = (e) = 116,986,063

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORIES OF ASSOCIATION FOR POSTAL COMMERCE**

Mechanized/Automation Flats - \$51.68/1000

$$\begin{array}{rcl} \text{(a)} & \text{(d)} & \text{(b)} \\ 26.57 \times 3.156.744 & = & 51.68 \\ \hline 1,623,014 & & \\ \text{(c)} & & \end{array}$$

note: (a) x (d) = (e) = 83,874,708

DECLARATION

I, Linda Kingsley, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Linda A. Kingsley

Date: 3-20-2000

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read "Susan M. Duchek", is written over a solid horizontal line.

Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990 Fax -5402
March 20, 2000